

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

MICHAEL HILD

Defendant.

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No. 19 Cr. 602 (RA)

DECLARATION OF MICHAEL HILD

I, MICHAEL HILD, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the foregoing is true and correct:

1. On or about January 14, 2020, Benjamin Dusing contacted me by email, stating that he saw the news of my criminal case, and offered to be my lawyer in *United States v. Hild*, 19 Cr. 602 (RA). A true and correct copy of that email is attached as Exhibit A.

2. In or about March 2020, I hired Mr. Dusing to represent me in *United States v. Hild*, 19 Cr. 602 (RA). Mr. Dusing did not previously represent me in any matter.

3. In or about March 2021, Mr. Dusing suggested that attorney Brandy Katy Lawrence join my criminal trial team as Mr. Dusing's trial partner. To my knowledge, Ms. Lawrence had no prior criminal law experience.

4. Both before and during my trial in April 2021, while I understood that Mr. Dusing was involved in other cases, as an attorney and as a party, and that Ms. Lawrence represented Mr. Dusing in other matters, I was never made aware of any conflict of interest, and I never provided informed consent to any conflict in writing.

5. In April 2021, both before and during my trial, I had no knowledge of there being activity in Mr. Dusing's and Ms. Lawrence's other cases. Had I known of the extent of Mr. Dusing's and Ms. Lawrence's involvement in their pending cases in Kentucky Family Court (*Dusing v. J.T.*, 15-CI-1945 and *J.B. v. Dusing*, 19-CI-560), and in particular how their involvement in those cases in April 2021 inherently conflicted with their representation of me at trial, I would not have waived the conflict.

Executed on July 27, 2021, in Richmond, Virginia.

A handwritten signature in blue ink, reading "Michael Hild", is written over a horizontal line.

Michael Hild

Exhibit A

From: Benjamin G Dusing bdusing@bgdlaw.com
Subject: Love you/call me
Date: January 14, 2020 at 10:23 AM
To: Michaelhild@[REDACTED]

BD

Saw the news. I am former federal white collar prosecutor and I am here as resource or even your lawyer depending on your situation. The system is very unjust, and local advocates often cannot be as strident as they need to be. Feel free to cal me for any reason, even just to talk. [REDACTED] is my cell. God bless you my friend.

I do work across the country.

Ben

Benjamin G. Dusing
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Fort Wright, KY 41011
Tele: 859-635-5000
Cell: [REDACTED]